

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

PAMELA JEAN CALDWELL,)	
)	
Plaintiff,)	3:20-cv-00147-DCLC-HBG
)	
vs.)	Judge Clifton L. Corker
)	Magistrate Judge H. Bruce Guyton
C.R. BARD INCORPORATED, and)	
BARD PERIPHERAL VASCULAR)	
INCORPORATED,)	
)	
Defendants.)	

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, pursuant to Fed. R. Civ. P. 41 (a)(1)(A)(ii), that the above-captioned case be dismissed without prejudice, with each party to bear its own costs.

Dated August 24, 2020.

Respectfully Submitted,

/s/ Keith Altman
Keith L. Altman
Excolo Law, PLLC
26700 Lahser Rd., Ste. 401
Southfield, MI 48033
T: 516-456-5885
Email: kaltman@lawampmmt.com

Attorneys for Plaintiff Pamela Jean Caldwell

By: /s/ Woods Drinkwater
Woods Drinkwater
Shane Gibson Ramsey
Nelson Mullins Riley & Scarborough, LLP
Atlantic Station
150 Fourth Avenue North
Suite 1100
Nashville, TN 37219
T: 615-664-5307
Email: woods.drinkwater@nelsonmullins.com
Email: shane.ramsey@nelsonmullins.com

Dell P. Chappell (*admitted pro hac vice*)
Eric A. Paine (*admitted pro hac vice*)
Joseph E. Fornadel, III (*admitted pro hac vice*)
Nelson, Mullins, Riley & Scarborough, LLP
1320 Main Street, 17th Floor
P O Box 11070
Columbia, SC 28211-1070
T: 803-255-9227
Email: dell.chappell@nelsonmullins.com
Email: eric.paine@nelsonmullins.com
Email: joe.fornadel@nelsonmullins.com

***Attorney for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System which will automatically send email notification of such filing to all attorneys of record, including:

Keith L. Altman
Excolo Law, PLLC
26700 Lahser Rd., Ste. 401
Southfield, MI 48033
T: 516-456-5885
Email: kaltman@lawampmmt.com

/s/ Woods Drinkwater
Woods Drinkwater